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December 16, 2013

VIA HAND DELIVERY

Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I write as counsel for plaintiff Chevron Corporation (“Chevron”) to forward to the Court a letter from G. Robert Blakey, now a professor at Notre Dame Law School, who was involved in the drafting of the RICO statute at the time of its enactment, requesting permission to file an amicus brief (a copy of which is also enclosed) on the legal issue of whether the RICO statute permits a private civil litigant to obtain equitable relief. As a logistical courtesy to Professor Blakey, we are e-filing and submitting his letter (and proposed amicus brief) to Your Honor at his request.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

cc: All counsel of record (w/ encl.)